



CREATIVE

(a) Ethics & Standards of Behavior Policy—H-P5.1.8

Creative's Ethics and Standards of Business Conduct Policy affirms the company's commitment to doing business ethically at all times and in a manner that accords with the highest professional standards of compliance with pertinent federal and state or local laws and regulations, and client regulations and with the laws of foreign nations that apply.

Given the broad scope, geographic coverage, and number of people of diverse backgrounds employed by Creative, it is imperative that the ground rules for operating ethically be firmly established, clearly understood, and adhered to at all times by Creative staff worldwide, consultants, authorized representatives and all others acting on behalf of the company. The ethical basis for our company's operations is founded on our four overarching ethical principles:

1. Equal Opportunity for Employment: Creative adheres to the spirit and letter of the law in providing equal opportunities for legal (as defined by the Immigration Reform Control Act—IRCA) employment. In making hiring decisions, Creative's policy and procedures ensure compliance with such laws, for instance, pertaining to Equal Employment Opportunity (EEO), Affirmative Action, and the Americans With Disabilities Act (ADA), and with others that apply.

2. Health and Welfare Provisions for Workers: Staff are Creative's greatest assets. Accordingly, it's imperative to ensure that they are accorded the benefits to which they are entitled under prevailing health and welfare laws and regulations, including, for instance: The Consolidated Omnibus Reconciliation Act (COBRA); the Occupational Safety & Health Act (OSHA); the Worker Adjustment & Retraining Notification Act (WARN); the Family and Medical Leave Act (FMLA); the Employee Retirement Income Security Act (ERISA); Health Insurance Portability, and Accountability Act (HIPAA); and to ensure that they are able to work in an environment free from harassment of any kind. In addition, Creative also adheres to laws of the District of Columbia that are designed to ensure that workers are treated fairly, which include, for instance, Workmen's Compensation, and Accrued Sick and Safe Leave.

3. Ethical Behavior of Workers: Creative's responsibility is to provide a physically and environmentally safe, healthy, and legally compliant workplace that is drug-free. Members of the Creative Team have the responsibility to comport themselves ethically and to use good judgment in the choices they make in performing their duties and in their personal

comportment on the job. Creative has zero tolerance for behaviors of any members of the Creative Team that harass others or that demonstrate hostility to others.

4. Ethical Standards of Business Conduct: Creative recognizes that the international work it performs can pose challenges to business integrity. Therefore, our Standards of Business Conduct provide a framework for understanding and responding to these challenges. Creative's Fraud & Abuse Policy is one demonstration of Creative's zero tolerance for unethical behaviors. Creative's Operational Assessments entail field operation reviews that are conducted under the auspices of the Field Administration team led by the Vice President and SDF. Karina Nersesyan, to ensure that Creative's policies and procedures are being followed in the field, is another demonstration of Creative's commitment to the highest standards of professionalism.

On a companywide basis, Creative's Compliance Department, led by Director Dr. Sharon Freeman, plays a critical role in helping to ensure that internal controls are in place and adhered to at all times.

Failure to abide by the principles, standards, and procedures set forth herein is grounds for disciplinary action up to and including termination. Information about ethical compliance failures should be immediately reported to direct supervisors, to the security team, to Human Resources, and as appropriate, to the Director of Compliance.